

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

LAUREN ADELE OLIVER,  
an individual,

Plaintiff,

vs.

Case No. 1:20-CV-00237-KK-SCY

MEOW WOLF, INC., a Delaware corporation;  
VINCE KADLUBEK, an individual and officer;  
and DOES 1-50,

Defendants.

**MEOW WOLF, INC.'S SUPPLEMENTAL RESPONSES TO  
PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION**

Defendant Meow Wolf, Inc., (Meow Wolf), by and through its undersigned counsel hereby submits these supplemental responses to Plaintiff's First Set of Requests for Production as follows:

**REQUESTS FOR PRODUCTION**

**REQUEST NO. 5:**

All DOCUMENTS CONCERNING national and international impacts, impressions, and viewings of the DOCUMENTARY and/or any trailer for the DOCUMENTARY.

**RESPONSE TO REQUEST NO. 5:**

Meow Wolf objects to this request on the grounds that documents concerning persons who have viewed the documentary or trailer for it seeks information not relevant to any claim or defense. Meow Wolf further objects that the request is overbroad and unduly burdensome and the burden and expense of producing the requested documents would vastly outweigh the likely benefit. Meow Wolf further objects to this request on the grounds that "national and international impacts" and

“impressions” is vague and ambiguous, leaving unclear what type of documents plaintiff actually seeks.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 5:**

Subject to and without waiving the previous general or specific objections, *see* MW\_014408 - 014413.

**REQUEST NO. 7:**

All COMMUNICATIONS between MEOW WOLF and TEA.

**RESPONSE TO REQUEST NO. 7:**

Meow Wolf objects to this request on the grounds that by calling for the production of all communications between Meow Wolf and Themed Entertainment Association without limiting the request to communications concerning Plaintiff or her work, the request seeks information not relevant to any claim or defense. Meow Wolf further objects that the request is overbroad and unduly burdensome and calls for documents that have no relationship or relevance to this action.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 7:**

Subject to and without waiving the previous general or specific objections, and the narrowed scope of responsive communications with Themed Entertainment Association (TEA) between 2016 and 2018, *see* MW\_014414 – 017200.

**REQUEST NO. 12:**

DOCUMENTS sufficient to verify the gross revenue MEOW WOLF realized from HoER, from March 16, 2016 to the present, including, without limitation, revenue from ticket sales, events, bar/café sales, gift shop sales, online sales, content sales, and licensing proceeds.

**RESPONSE TO REQUEST NO. 12:**

Meow Wolf objects to this request on the grounds that it is overbroad, unduly burdensome, and seeks information far beyond what is relevant to the claims or defenses in this action. Meow Wolf further objects that the request for documents concerning all proceeds derived by Meow Wolf over a period of more than 4 years including revenue wholly unrelated to plaintiff's work would impose a burden that outweighs any likely benefit, is not proportional to the needs of the case, and is intrusive and harassing.

**SUPPLEMENTAL RESPONSE TO REQUEST NO. 12:**

Subject to and without waiving the previous general or specific objections, *see* MW\_017201, MW\_014408 – 014413, which reflect revenue and expenses related to Meow Wolf's HoER Coloring Book, HoER Exhibition Catalog, and documentary.

Dated: March 10, 2021

Respectfully submitted,

BARDACKE ALLISON LLP

/s/ Breanna Contreras

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*Counsel for Meow Wolf Inc. and Vince Kadlubek*